

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

Joshua Winer,

Plaintiff,

v.

Umaymah Mohammad, AJP
Educational
Foundation, Inc. A/K/A American
Muslims For Palestine, WESPAC
Foundation, Inc., Sean Eren as the
representative of National Students for
Justice in Palestine, Doctors Against
Genocide Society, Cair-Nga Inc. A/K/A/
CAIR-Georgia, CAIR Foundation Inc.,
A/K/A Council on Islamic Relations or
CAIR, Rupa Marya, Ibrahim Jouja as
representative of Emory Students for
Justice in Palestine,

Defendants.

CIVIL ACTION FILE

No. 1:25-cv-02329

**MOTION FOR EXTENSION OF TIME TO FILE PLAINTIFF'S
RESPONSE TO DEFENDANT AJP EDUCATIONAL
FOUNDATION'S MOTION TO DISMISS**

Plaintiff Joshua Winer ("Plaintiff"), hereby moves for an order extending Plaintiff's time to respond to AJP's Motion to Dismiss to November 7, 2025. In support, Plaintiff shows the Court as follows:

1. Plaintiff filed his original complaint in this case on April 25, 2025.

2. Plaintiff filed his Amended Complaint on May 20, 2025, adding a claim under 42 U.S.C. § 1985(3).

3. Defendant AJP was served on June 13, 2025, making its original deadline to respond to the Amended Complaint July 7, 2025.

4. On July 4, 2025, AJP filed a motion, with Plaintiff's consent, to file a response on or before August 6, 2025. *See* Dkt. 49. It was agreed that, if AJP moved to dismiss, Plaintiff would have until September 29, 2025, to respond. *See id.*; *see also* Dkt. 51 (granting the motion). AJP indeed moved to dismiss on August 5, 2025, *see* Dkt. 83, thus, Plaintiff's response to the motion is currently due September 29, 2025. In the ordinary course, that would make AJP's reply in support of the motion due October 13, 2025. *See* L.R. 7.1(C).

5. Other than Defendant Sean Eren, as representative for National Students for Justice in Palestine, who will be served by publication pursuant to the Court's Order (dkt. 89), each of the other seven defendants in this case has since appeared and filed motions to dismiss. *See* Dkt. Nos. 41, 63, 73, 94, 95, 96, 97. To date, Plaintiff has responded to two of the motions. *See* Dkt. Nos. 60, 91. The deadline to respond to the remaining defendants' motions is, by court order, November 7, 2025. *See* Dkt. Nos. 66, 90, 100.

6. In the process of responding to the various motions to dismiss, Plaintiff has elected to seek leave to file a Second Amended Complaint under

Federal Rule of Civil Procedure 15(a)(2). Defendants did not consent to this amendment. Thus, Plaintiff filed a motion for leave to amend. *See* Dkt. 109.

7. If leave is granted, Plaintiff consents to re-briefing of the motions to dismiss or supplemental briefing, as appropriate.

8. Thus, in order to conserve the parties' resources, Plaintiff respectfully requests an extension of time to respond to AJP's Motion to Dismiss until November 7, 2025.

9. This request is made to save Plaintiff and AJP the burden and expense of briefing AJP's Motion to Dismiss while the Motion for Leave to Amend is pending. If the Court grants the Motion for Leave to Amend, then Plaintiff anticipates re-briefing or supplemental briefing of AJP's Motion to Dismiss (dkt. 83), making it unnecessarily burdensome for the parties to file a response or reply to AJP's Motion to Dismiss the First Amended Complaint. If the Court denies the Motion for Leave to Amend, then Plaintiff's deadline to respond to AJP's pending Motion to Dismiss (dkt. 83) will be aligned with the remaining Defendants in this case: November 7, 2025. Thus, this request preserves the parties' resources without delaying the progress of this case or prejudicing any party.

10. This is Plaintiff's second request for an extension of time to respond to AJP's Motion to Dismiss (dkt. 83)—as just discussed, this request is made in good faith and not for purposes of delay.

11. A proposed Order is attached for the Court's consideration.

Respectfully submitted this 16th day of September, 2025.

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CERTIFICATE OF COMPLIANCE

By signature below, counsel certifies that the foregoing was prepared in Century Schoolbook, 13-point font, in compliance with Local Rule 5.1(C).

/s/ Miles C. Skedsvold
Miles C. Skedsvold

CERTIFICATE OF SERVICE

I hereby certify that I have this day electronically filed the within and foregoing **CONSENT MOTION FOR EXTENSION OF TIME TO FILE PLAINTIFF'S RESPONSE TO DEFENDANT AJP EDUCATIONAL FOUNDATION'S MOTIONS TO DISMISS** with the Clerk of Court using the CM/ECF electronic filing system, which suffices for service on all counsel of record who have entered an appearance in the case under L.R. 5.1(A)(3).

This 16th day of September, 2025.

/s/ Miles C. Skedsvold
Miles C. Skedsvold